



Re: EPH/VPH, EPA direction 📎

Sean Sheldrake to: cstivers, pdost, rbarth, Robert Wyatt, jedwards

09/15/2011 09:57 AM

"McCue, Tom", agladstone, James Peale, "Eastwood, Hanne", cyril.alex, ted_buerger, cora.iori, bayuk.dana, allen.elizabeth, fuentes.rene, Genevieve.Angle, peterson.jennifer, jeremy_buck, ANDERSON.Jim, straughan.john, PetersonLE, MCCLINCY Matt, Cc: POULSEN Mike, Nancy.Munn, Mark Ader, Chip Humphrey, koch.kristine, reopn, aebbetts, audiehuber, Brandy.Humphreys, cunninghame, Colin Wagoner, dallan, erin.madden, jdww, Jennifer Peers, jweis, Lisa.Bluelake, "Michael Karnosh", matt, rose, tomdd, rick.j.kepler, Robert.Neely, shephard.burt, Dan Phalen, GAINER Tom

Bob,

EPA directs NW Natural and Siltronic to analyze soil and sediment samples collected during the data gaps investigation fieldwork and archived for potential EPH analysis. These samples have already been analyzed for VPH. EPA understands this consists of the following samples:

- Riverbank soil (collected at 12 borings Sept 27-Oct 15, 2010) which includes all samples selected for the full chemistry suite (24 samples)
- Sediment grabs collected at 13 stations Oct 12-14, 2010
- Sediment grabs collected at 8 stations April 18-19, 2011

EPA is providing this direction now to ensure consistency with the Harborwide process; specifically, the Portland Harbor Baseline Ecological Risk Assessment (BERA) has not been finalized and there are still concerns about the sediment Preliminary Remediation Goals (PRGs) with respect to TPH and benthic risk. In addition, the current sample set will begin expiring for its holding times later this month for EPH analysis. This decision is also necessary to be consistent with adjacent upland work; Oregon Department of Environmental Quality guidance supports the need to perform this analysis from the standpoint of source control for riverbank soils and sediments.

Thank you.

S

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Region 10 Dive Team: <http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team>
Portland Harbor Cleanup: <http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
Green Cleanups: <http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>
Green Cleanups (EPA only):
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener+cleanups>
Deliveries: Parking Garage mailroom (1st floor)
Visitors: Check-in @ PERC / Service Center on 12th floor:
<http://yosemite.epa.gov/r10/extaff.nsf/PERC/Visiting+Seattle>

"Wyatt, Robert"

Hi Sean, Upon receipt of your approval letter N...

11/29/2010 11:44:12 AM

From: "Wyatt, Robert" <rjw@nwnatural.com>
To: Sean Sheldrake/R10/USEPA/US@EPA

Cc: "rbarth@anchorenv.com" <rbarth@anchorenv.com>, "Carl Stivers [cstivers@anchorenv.com]" <cstivers@anchorenv.com>, Patty Dost <pdost@pearllegalgroup.com>, Kim Slinski <kslinski@anchorage.com>, T McCue <tom.mccue@siltronic.com>, "agladstone@davisrothwell.com" <agladstone@davisrothwell.com>, James Peale <jpeale@mfainc.org>, "heastwood@davisrothwell.com" <heastwood@davisrothwell.com>
Date: 11/29/2010 11:44 AM
Subject: EPA/VPH

Hi Sean,

Upon receipt of your approval letter NW Natural immediately directed the laboratory to conduct the VPH analysis and to continue archiving the EPH samples collected from the 13 surface sampling stations identified in our October 14 proposal. Although we directed the lab to conduct the VPH analysis immediately following receipt of your letter, the lab has informed us that the VPH sample analysis may not be completed within the standard 14-day hold time. In addition to the VPH analysis, NW Natural has located the limited Lower Willamette Group TPH fraction data set that EPA requested. The attached file includes a sample location map, geologic logs, and the available TPH fraction data for those samples. Review of this data supports the conclusion that analysis of additional samples for EPH and/or VPH is unwarranted. In addition to the reasons previously provided, this review confirms that there was no VPH data collected for the Portland Harbor Site, and that there is no EPH toxicity identified at the Gasco site based on comparison to the EPA-provided TPH TRVs.

NW Natural still believes that evaluation of TPH fractionation data is, and will continue to be, inconsistent with the Portland Harbor Site process. We also believe that TPH fraction data is not needed as a potential line of evidence to adequately define risk and set action levels for development, evaluation and design of the EE/CA remedy. If these data become consistent with the Portland Harbor Site process in the future, NW Natural would agree at that time to perform the necessary evaluation of the data and/or implement future data collection/analysis to support the EE/CA remedy development and design. Currently, we have no basis or means to evaluate the existing data in a manner consistent with the Portland Harbor Site process that would provide meaningful results that support the Gasco project.

Please let me know if you have any questions.

Thank you,



Bob Gasco LWG TPH Fraction Sampling Loc_Data_Logs_102810.pdf